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Attorneys for
Defendant Lloyds TSB Bank Geneva

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
Fairfield Sentry Limited, et al.,
Debtors in Foreign Proceedings.

Fairfield Sentry Limited, et al. (In Liquidation),
acting by and through the Foreign Representatives
thereof,

Plaintiffs,

– against –

Theodoor GGC Amsterdam et al.,
Defendants.

Fairfield Sentry Limited, et al. (In Liquidation),
acting by and through the Foreign Representatives
thereof,

Plaintiffs,

– against –

ABN AMRO Schweiz AG et al.
Defendants.

Fairfield Sentry Limited, et al. (In Liquidation),
acting by and through the Foreign Representatives
thereof,

Plaintiffs,

– against –

ABN AMRO Schweiz AG et al.

Ch. 15 Case

Case No. 10-13164 (SMB)

Jointly Administered

Adv. Pro. No. 10-03496 (SMB)

Procedurally Consolidated
Under this Matter

Adv. Pro. No. 10-03635 (SMB)

Adv. Pro. No. 10-03636 (SMB)

Defendants.

**LLOYDS TSB BANK GENEVA’S NOTICE OF JOINDER IN
DEFENDANTS’ MOTION TO DISMISS AND IN
OPPOSITION TO PLAINTIFFS’ MOTION FOR LEAVE TO AMEND**

Lloyds TSB Bank Geneva, by and through its undersigned counsel, submitted the Consolidated Memorandum of Law in Opposition to Plaintiffs’ Motion for Leave to Amend and in Support of Defendants’ Motion to Dismiss, filed on January 13, 2017, in Adversary Proceeding No. 10-03496 (ECF No. 960), and other related adversary proceedings before this Court.

Lloyds TSB Bank Geneva hereby joins in the motion to dismiss and supporting documents filed on January 13, 2017, by Clearly Gottlieb Steen & Hamilton, LLP (“Cleary”), in Adversary Proceeding No. 10-03496 (ECF Nos. 959-964) and other related adversary proceedings before this Court, and adopts and fully incorporates by reference those documents and all contemporaneous or subsequent filings by Cleary on behalf of the joint defense group in support of Defendants’ motion to dismiss, and in opposition to Plaintiffs’ motion for leave to amend.

Lloyds TSB Bank Geneva submitted the Supplemental Memorandum of Law of Defendants in the Adversary Proceedings Listed on Appendix A in Opposition to Plaintiffs’ Motion for Leave to Amend and in Support of Those Defendants’ Motion to Dismiss on Grounds of *Forum non Conveniens*, filed on January 27, 2017, in Adversary Proceeding No. 10-03496 (ECF No. 1109) and other related adversary proceedings before this Court.

Lloyds TSB Bank Geneva hereby joins in the motion to dismiss and supporting documents filed on January 27, 2017 (the “FNC Motion”), by Hogan Lovells US LLP (“Hogan”), in Adversary Proceeding No. 10-03496 (ECF Nos. 1107, 1109, 1111) and other

related adversary proceedings before this Court, and adopts and fully incorporates by reference those documents and all contemporaneous or subsequent filings by Hogan in support of the FNC Motion.

Lloyds TSB Bank Geneva hereby joins Section I of the Individual Supplemental Brief (Concerning Preemption and Service), filed on January 26, 2017, by Becker, Glynn, Muffly, Chassin & Hosinski LLP (“Becker Glynn”), in Adversary Proceeding No. 10-03863 (ECF No. 36), and adopts and fully incorporates by reference that section of that document.

Lloyds TSB Bank Geneva submitted the Notice of Motion to Dismiss Based on the Doctrine of *Res Judicata* and the Supplemental Memorandum in Support of Defendants’ Motion to Dismiss Based on the Doctrine of *Res Judicata*, filed on January 27, 2017, in Adversary Proceeding No. 10-03496 (ECF Nos. 1131, 1133) and other related adversary proceedings before this Court.

Dated: January 27, 2017
New York, New York

KATTEN MUCHIN ROSENMAN LLP

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